

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

HILDA L. SOLIS)	
Secretary of Labor,)	
United States Department of Labor,)	
)	
)	
Plaintiff,)	
)	
v.)	Cause No. 2:10-CV-00086
)	
LOCAL UNION 1014, UNITED)	
STEELWORKERS OF AMERICA)	
)	
)	
Defendant.)	

STIPULATION OF SETTLEMENT

It is hereby stipulated that the Plaintiff, Hilda L. Solis, Secretary of Labor (Secretary) and the Defendant, Local Union 1014, United Steelworkers of America (Local 1014 or Defendant) by and through their undersigned counsel hereby agree to the settlement of this dispute as follows and respectfully request that the court so order:

1. The Secretary brought this action pursuant to Title IV of the Labor-Management Reporting and Disclosure Act of 1959 (as amended), 29 U.S.C. § 401, *et seq.*, (hereinafter referred to as the Act), for the purpose of voiding the Defendant's April 27, 2009 election of union officers for the offices of President, Vice President, Recording Secretary, Treasurer, Guide, Inner Guard, and two Trustee positions, and requesting that the Defendant conduct a new election for these offices under the supervision of the Secretary of Labor.

2. A Department of Labor investigation concluded that Defendant violated section 401(g) of the Act (29 U.S.C. 481(g)) during the conduct of the aforesaid election when campaign

fund raising activities were performed at the employer's facility during time when the fundraisers were being paid by the employer.

3. Local 1014 does not admit that it violated the aforementioned provision of Title IV in its April 27, 2009 election.

4. The Parties, in settlement of this action, hereby stipulate and agree that the Defendant shall conduct, under the supervision of the Secretary, Defendant's next regularly scheduled election of officers, including nominations, for all officer positions, to be conducted prior to May 1, 2012.

5. The Parties agree that the supervised election shall be conducted in accordance with Title IV of the Act, 29 U.S.C. §§ 481-484, and, insofar as lawful and practicable, in accordance with the United Steelworkers of America Constitution (Constitution) and the Local 1014 Bylaws (Bylaws).

6. All decisions as to the interpretation or application of Title IV of the Act and the United Steelworkers of America Constitution and the Local 1014 Bylaws relating to the supervised election are to be determined by the Secretary, and her decisions shall be final and binding.

7. The Court shall retain jurisdiction of this action. After completion of the supervised election, the Secretary shall certify to the Court the names of the persons so elected, that such election was conducted in accordance with Title IV of the Act, and, insofar as lawful and practicable, that the election was conducted in accordance with said Constitution and Bylaws. Upon the Court's receipt and approval of such certification, the Court shall enter a judgment

declaring that such persons have been elected as shown by such certification to serve as the duly elected officers of Local 1014.

8. Each party agrees to bear its own costs, fees, and other expenses incurred by such party in connection with any stage of this proceeding.

Respectfully Submitted,

M. PATRICIA SMITH
Solicitor of Labor

BEVERLY DANKOWITZ
Acting Associate Solicitor

JOAN E. GESTRIN
Regional Solicitor

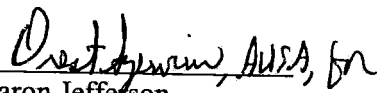
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Counsel for Legal Advice

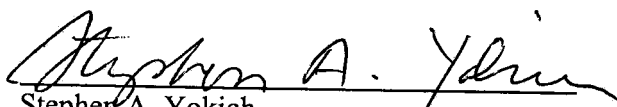
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